

1 EDMUND G. BROWN JR.  
Attorney General of California  
2 KAREN B. CHAPPELLE  
Supervising Deputy Attorney General  
3 GEOFFREY WARD  
Deputy Attorney General  
4 State Bar No. 246437  
300 So. Spring Street, Suite 1702  
5 Los Angeles, CA 90013  
Telephone: (213) 897-2660  
6 Facsimile: (213) 897-2804  
*Attorneys for Complainant*

7  
8 **BEFORE THE**  
**BOARD OF REGISTERED NURSING**  
9 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

10 In the Matter of the Accusation Against:

Case No. *2011-557*

11 **JESSICA NADINE GLOVER**

12 **826 4th Terrace West**  
13 **Birmingham, AL 35204**

**A C C U S A T I O N**

14 **Registered Nurse License No. 737348**

15 Respondent.

16  
17 Complainant alleges:

18 **PARTIES**

19 1. Louise R. Bailey, M.Ed., R.N. ("Complainant") brings this Accusation solely in her  
20 official capacity as the Executive Officer of the Board of Registered Nursing, Department of  
21 Consumer Affairs.

22 2. On or about September 25, 2008, the Board of Registered Nursing issued Registered  
23 Nurse License Number 737348 to Jessica Nadine Glover ("Respondent"). The Registered Nurse  
24 License expired on April 30, 2010 and has not been renewed.

25 **JURISDICTION AND STATUTORY PROVISIONS**

26 3. This Accusation is brought before the Board of Registered Nursing ("Board"),  
27 Department of Consumer Affairs, under the authority of the following laws:  
28



1 **FIRST CAUSE FOR DISCIPLINE**

2 **(Disciplinary Action by the Alabama State Board of Nursing)**

3 8. Respondent is subject to disciplinary action under Section 2761 subdivision (a)(4)  
4 because the Alabama State Board of Nursing ("Alabama Board") took disciplinary action against  
5 her for a positive drug test for marijuana. The circumstances of the Alabama Board's disciplinary  
6 action are as follows:

7 9. On or about January 22, 2010, the Alabama Board made findings of fact, reached  
8 conclusions of law and issued an order ("Order") in the disciplinary matter entitled, *In the Matter*  
9 *of N. Gennell Lee, RN, MSN, JD v. Jessica Nadine Glover, Respondent.*

10 10. In its Order, the Alabama Board found that Respondent had committed  
11 unprofessional conduct by testing positive for marijuana use on a pre-employment drug screening  
12 conducted by Winegrass Hospice in Hoover, Alabama. At the time of the positive test,  
13 Respondent had already resigned her position and accepted a job at a home health agency.

14 11. In its Order, the Alabama Board imposed the disciplinary action of placing  
15 Respondent's nursing license on probation for 5 years, and required Respondent to participate in a  
16 chemical dependency program.

17 12. Under Section 2761 subdivision (a)(4) of the Code, the disciplinary action by the  
18 Alabama Board for Respondent's positive drug test for marijuana is grounds for the Board to take  
19 disciplinary action.

20 **PRAYER**

21 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,  
22 and that following the hearing, the Board of Registered Nursing issue a decision:

23 1. Revoking or suspending Registered Nurse License Number 737348, issued to Jessica  
24 Nadine Glover;

25 2. Ordering Jessica Nadine Glover to pay the Board of Registered Nursing the  
26 reasonable costs of the investigation and enforcement of this case, pursuant to Business and  
27 Professions Code Section 125.3;

28 ///

3. Taking such other and further action as deemed necessary and proper.

DATED: December 21, 2010 Louise R. Bailey  
LOUISE R. BAILEY, M.Ed., R.N.  
Executive Officer  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California  
Complainant

LA2010601318  
60590356.docx